

Fill in this information to identify the case:

United States Bankruptcy Court for the:

**Northern District of Texas, Dallas Division**

Case number (if known) \_\_\_\_\_ Chapter 11

Check if this an  
amended filing

## Official Form 205

### Involuntary Petition Against a Non-Individual

12/15

Use this form to begin a bankruptcy case against a non-individual you allege to be a debtor subject to an involuntary case. If you want to begin a case against a non-individual, use the *Involuntary Petition Against an Individual* (Official Form 105). Be as complete and accurate as possible. If more space is needed, attach any additional sheets to this form. On the top of any additional pages, write debtor's name and case number (if known).

#### **Part 1: Identify the Chapter of the Bankruptcy Code Under Which Petition Is Filed**

1. Chapter of the Bankruptcy Code Check one:

Chapter 7  
 Chapter 11

#### **Part 2: Identify the Debtor**

2. Debtor's name AiBUY Holdco, Inc.

3. Other names you know the debtor has used in the last 8 years AiBUY, Inc.  
a.k.a Cinsay, Inc.

Include any assumed names, trade names, or doing business as names.

4. Debtor's federal Employer Identification Number (EIN)  Unknown

EIN \_\_\_\_\_

#### 5. Debtor's address

Principal place of business  
**13355 Noel Road, 4th Floor**  
Number Street  
  
**Dallas TX 75240-0000**  
City State Zip Code  
  
**Dallas**  
County

#### Mailing address, if different

**13355 Noel Road, 4th Floor**

Number Street

P.O. Box

**Dallas TX 75240-0000**

City State Zip Code

#### Location of principal assets, if different from principal place of business

Number Street

City State Zip Code

6. Debtor's website (URL) www.aibuy.io

7. Type of debtor  Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))  
 Partnership (excluding LLP)  
 Other type of debtor. Specify: \_\_\_\_\_

8. Type of debtor's business Check one:

Health Care Business (as defined in 11 U.S.C. § 101(27A))  
 Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))  
 Railroad (as defined in 11 U.S.C. § 101(44))  
 Stockbroker (as defined in 11 U.S.C. § 101(53A))

Debtor

**AiBUY Holdco, Inc.**

Case number (if known)

Commodity Broker (as defined in 11 U.S.C. § 101(6))  
 Clearing Bank (as defined in 11 U.S.C. § 781(3))  
 None of the types of business listed.  
 Unknown type of business.

**9. To the best of your knowledge, are any bankruptcy cases pending by or against any partner or affiliate of this debtor?**

No  
 Yes. Debtor

Relationship

District

Date filed

Case number, if known

MM / DD / YYYY

Debtor  
District

Date filed  
MM / DD / YYYY

Relationship  
Case number, if known

**Part 3: Report About the Case**

**10. Venue**

Check one:

Over the last 180 days before the filing of this bankruptcy, the debtor had a domicile, principal place of business, or principal assets in this district longer than in any other district.  
 A bankruptcy case concerning debtor's affiliates, general partner, or partnership is pending in this district.

**11. Allegations**

Each petitioner is eligible to file this petition under 11 U.S.C. § 303(b).

The debtor may be the subject of an involuntary case under 11 U.S.C. § 303(a).

*At least one box must be checked:*

The debtor is generally not paying its debts as they become due, unless they are in the subject of a bona fide dispute as to liability or amount.  
 Within 120 days before the filing of this petition, a custodian, other than a trustee, receiver, or agent appointed or authorized to take charge of less than substantially all of the property of the debtor for the purpose of enforcing a lien against such property, was appointed or took possession.

**12. Has there been a transfer of any claim against the debtor by or to any petitioner?**

No

Yes. Attach all documents that evidence the transfer and any statements required under Bankruptcy Rule 1003(a).

**13. Each petitioner's claim**

Name of petitioner	Nature of petitioner's claim	Amount of the claim above the value of any lien
<b>Jon Gunderson</b>	<b>Promissory Note</b>	<b>\$575,075.97</b>
		\$
		\$
<b>John Kutasi</b>	<b>Promissory Note</b>	<b>\$1,624,933.33</b>
		\$
		\$
<b>Deposits Inc.</b>	<b>Trade Creditor</b>	<b>\$39,821.30</b>
		\$
		\$
Total of petitioners' claims		<b>\$2,239,830.60</b>

If more space is needed to list petitioners, attach additional sheets. Write the alleged debtor's name and the case number, if known, at top of each sheet. Following the format of this form, set out the information required in Parts 3 and 4 of the form for each statement under penalty of perjury set out in Part 4 of the form, followed by each additional petitioner's (or representative's) signature, along with the signature of the petitioner's attorney.

**Part 4 Request for Relief**

**WARNING** -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Debtor

**AiBUY Holdco, Inc.**

Case number (if known)

Petitioners request that an order for relief be entered against the debtor under the chapter of 11 U.S.C. specified in this petition. If a petitioning creditor is a corporation, attach the corporate ownership statement required by Bankruptcy Rule 1010(b). If any petitioner is a foreign representative appointed in a foreign proceeding, attach a certified copy of the order of the court granting recognition.

I have examined the information in this document and have a reasonable belief that the information is true and correct.

**Petitioners or Petitioners' Representative**

**Attorneys**

**Name and mailing address of petitioner**

**Jon Gunderson**

Name

**2217 Sea Biscuit, #107**

Number Street

**Spicewood, TX 78669-0000**

City

State Zip Code

**Name and mailing address of petitioner's representative, if any**

Name

Number Street

**00000-0000**

City

State Zip Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

MM / DD / YYYY

Signature of petitioner or representative, including representative's title

**Petitioners or Petitioners' Representative**

**Name and mailing address of petitioner**

**John Kutasi**

Name

**5627 Sloan Place**

Number Street

**Calabasas, CA 91302-0000**

City

State Zip Code

**Name and mailing address of petitioner's representative, if any**

Name

Number Street

City

State Zip Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

MM / DD / YYYY

Signature of petitioner or representative, including representative's title

**Attorneys**

**John E. Mitchell**

Printed name

**Katten Muchin Rosenman LLP**

Firm name, if any

**2121 North Pearl Street, Suite 1100**

Number Street

**Dallas, TX 75201-2591**

City

State Zip Code

Contact phone **(469) 627-7017**

Email **john.mitchell@katten.com**

Bar number **00797095**

State **TX**

*/s/ John E. Mitchell*

Signature of attorney

Date signed **09/23/2022**

MM / DD / YYYY

**Attorneys**

**John E. Mitchell**

Printed name

**Katten Muchin Rosenman LLP**

Firm name, if any

**2121 North Pearl Street, Suite 1100**

Number Street

**Dallas, TX 75201-2591**

City

State Zip Code

Contact phone **(469) 627-7017**

Email **john.mitchell@katten.com**

Bar number **00797095**

State **TX**

*/s/ John E. Mitchell*

Signature of attorney

Date signed **09/23/2022**

MM / DD / YYYY

Debtor

AiBUY Holdco, Inc.

Case number (if known) \_\_\_\_\_

Petitioners or Petitioners' Representative

Name and mailing address of petitioner  
**Deposits Inc.**

Name \_\_\_\_\_

**2001 Ross Avenue, Suite 7001558F**

Number Street \_\_\_\_\_

**Dallas, TX 75201-0000**

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Name and mailing address of petitioner's representative, if any

Name \_\_\_\_\_

Number Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on \_\_\_\_\_

MM / DD / YYYY

Signature of petitioner or representative, including representative's title

Attorneys

**John E. Mitchell**

Printed name \_\_\_\_\_

**Katten Muchin Rosenman LLP**

Firm name, if any \_\_\_\_\_

**2121 North Pearl Street, Suite 1100**

Number Street \_\_\_\_\_

**Dallas, TX 75201-2591**

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Contact phone (469) 627-7017 Email john.mitchell@katten.com

Bar number 00797095

State TX

*/s/ John E. Mitchell*

Signature of attorney \_\_\_\_\_

Date signed 09/23/2022

MM / DD / YYYY

Debtor AiBUY Holdco, Inc.

Case number (if known) \_\_\_\_\_

Petitioners request that an order for relief be entered against the debtor under the chapter of 11 U.S.C. specified in this petition. If a petitioning creditor is a corporation, attach the corporate ownership statement required by Bankruptcy Rule 1010(b). If any petitioner is a foreign representative appointed in a foreign proceeding, attach a certified copy of the order of the court granting recognition.

I have examined the information in this document and have a reasonable belief that the information is true and correct.

Petitioners or Petitioners' Representative

Attorneys

Name and mailing address of petitioner

Jon Gunderson

Name

2217 Sea Biscuit, #107

Number Street

Spicewood, TX 78669-0000

City

State Zip Code

Name and mailing address of petitioner's representative, if any

Name

Number Street

00000-0000

City

State Zip Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

09/22/2022

MM / DD / YYYY

Signature of petitioner or representative, including representative's title

Petitioners or Petitioners' Representative

Attorneys

Name and mailing address of petitioner

John Kutasi

Name

5627 Sloan Place

Number Street

Calabasas, CA 91302-0000

City

State Zip Code

Name and mailing address of petitioner's representative, if any

Name

Number Street

City

State Zip Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

MM / DD / YYYY

Signature of petitioner or representative, including representative's title

John E. Mitchell

Printed name

Katten Muchin Rosenman LLP

Firm name, if any

2121 North Pearl Street, Suite 1100

Number Street

Dallas, TX 75201-2591

City

State

Zip Code

Contact phone (469) 627-7017

Email john.mitchell@katten.com

Bar number 00797095

State

TX

Signature of attorney

Date signed

MM / DD / YYYY

Debtor AiBUY Holdco, Inc.

Case number (if known) \_\_\_\_\_

Petitioners request that an order for relief be entered against the debtor under the chapter of 11 U.S.C. specified in this petition. If a petitioning creditor is a corporation, attach the corporate ownership statement required by Bankruptcy Rule 1010(b). If any petitioner is a foreign representative appointed in a foreign proceeding, attach a certified copy of the order of the court granting recognition.

I have examined the information in this document and have a reasonable belief that the information is true and correct.  
Petitioners or Petitioners' Representative

Attorneys

Name and mailing address of petitioner

Jon Gunderson

Name

2217 Sea Biscuit, #107

Number Street

Spicewood, TX 78669-0000

City

State Zip Code

Name and mailing address of petitioner's representative, if any

Name

Number Street

00000-0000

City

State Zip Code

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on

MM / DD / YYYY

Signature of petitioner or representative, including representative's title

Petitioners or Petitioners' Representative

Name and mailing address of petitioner

John Kutasi

Name

5627 Sloan Place

Number Street

Calabasas, CA 91302-0000

City

State Zip Code

Name and mailing address of petitioner's representative, if any

Name

Number Street

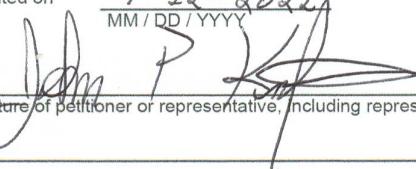
City

State Zip Code

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on 9-22-2022

MM / DD / YYYY

Signature of petitioner or representative, including representative's title



Attorneys

John E. Mitchell

Printed name

Katten Muchin Rosenman LLP

Firm name, if any

2121 North Pearl Street, Suite 1100

Number Street

Dallas, TX 75201-2591

City

State Zip Code

Contact phone (469) 627-7017 Email john.mitchell@katten.com

Bar number 00797095

State TX

Signature of attorney

Date signed

MM / DD / YYYY

Debtor

AiBUY Holdco, Inc.

Case number (if known) \_\_\_\_\_

Petitioners or Petitioners' Representative

Name and mailing address of petitioner  
**Deposits Inc.**

Name \_\_\_\_\_

**2001 Ross Avenue, Suite 7001558F**

Number Street \_\_\_\_\_

**Dallas, TX 75201-0000**

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Name and mailing address of petitioner's representative, if any

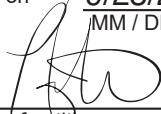
Name \_\_\_\_\_

Number Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on 9/23/22

MM / DD / YYYY



Signature of petitioner or representative, including representative's title

Attorneys

**John E. Mitchell**

Printed name \_\_\_\_\_

**Katten Muchin Rosenman LLP**

Firm name, if any \_\_\_\_\_

**2121 North Pearl Street, Suite 1100**

Number Street \_\_\_\_\_

**Dallas, TX 75201-2591**

City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_

Contact phone (469) 627-7017 Email john.mitchell@katten.com

Bar number 00797095

State TX

Signature of attorney \_\_\_\_\_

Date signed \_\_\_\_\_

MM / DD / YYYY

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re: § Chapter 11  
§  
AIBUY HOLDCO, INC. § Case No. 22-\_\_\_\_(\_\_\_\_)  
§  
Alleged Debtor. §  
§

**CORPORATE OWNERSHIP STATEMENT**

Pursuant to rules 7007.1 and 1010(b) of the Federal Rules of Bankruptcy Procedures, Deposits, Inc. (“Deposits”) hereby files its Corporate Ownership Statement and states that Joseph Akintolayo is the majority shareholder of Deposits and that no other public entity directly or indirectly holds 10% or more of the equity interests of Deposits.

Dated: 9/23/22

  
\_\_\_\_\_  
Joseph Akintolayo  
Deposits, Inc., CEO